

Speech-Language Pathology and Audiology Board

California Performance Review (CPR) Commission Hearing

September 27, 2004

Testimony Presented by Marcia Raggio, Ph.D., Board Chair

It would appear that the dissolution of the Speech-Language Pathology and Audiology Board (SLPAB), and the movement of its activities to the Dept. of Commerce and Consumer Protection, may be an oversight on the part of the Commission. The SLPAB is the only health-related board to be slated for dissolution, with the redistribution of its activities to a department that deals with business-related functions. I would like to speak to these two issues.

The SLPAB is made up of allied health professionals including speech-language pathologists and audiologists, as well as public members. The professions of Speech-Language Pathology and Audiology share the same rigorous educational and practical training requirements as those of optometry, physical therapy, pharmacy, dentistry and nursing. However, the regulatory boards of these professions are not being dissolved, and in fact, are being placed under a more appropriate agency. At present, these boards, along with SLPAB, work together under the auspices of the Dept. of Consumer Affairs. By the ease of communication afforded by this close relationship, these boards that deal with so many related regulatory issues, are able to exchange information in a highly effective manner with regard to scores of cross-cutting issues. It should be made clear that the SLPAB works so closely with the medical profession that one of the appointed, public board members of SLPAB, as defined in statute, must be a physician who specializes in ear, nose and throat disorders.

The professions of Speech-Language Pathology and Audiology are independent and proliferate aspects of the allied health care system in the state of California, as well as the entire nation. The exponential growth in the assigned pathologies and populations diagnosed and treated by these providers has required a significant increase in the accompanying training and required professional acumen. Estimates by the National Institute on Deafness and Other Communication Disorders (NIDCD) indicate that one in every six persons, or 42 million Americans, have a speech, language or voice disorder, and/or hearing loss (NIDCD, 1995).

The primary role of this licensing Board is to provide critical oversight to professions that are essential to the health care of California's citizens, but also have aspects that, if not regulated, could have a severe negative impact on consumer protection. Speech-Language Pathologists (SLPs) and Audiologists provide services in a number of professional environments using a variety of techniques that have the potential to cause harm if not performed with skill and training. Examples of the risks posed by the tasks performed by these health professions include: misdiagnosis of newborn hearing loss (a mandated procedure by the Legislature of the State of California), as well as in children; rigid and flexible endoscopy in which a scope is passed through the nasopharynx for evaluation of swallowing; misdiagnosis from radiologic and endoscopic tests leading to aspiration pneumonia and unnecessary surgeries which can lead to severe health risks including death; feeding techniques for stroke patients who have disordered swallowing; cerumen management in which instruments are inserted into the ear canal; misdiagnosis of symptoms of laryngeal carcinoma in dealing with vocal hoarseness; and prosthetic fittings of devices to

support speech in laryngectomy patients. While the board is currently investigating a relatively large number of consumer complaints, the number would surely be significantly larger if this board were not providing standards and oversight to this health industry.

Speech-Language Pathologists and Audiologists in California provide services to every age group, every pathology pertinent to their fields, and every ethnicity. They do so in a myriad of locations and facilities, and must adapt to continual changes in all of these aspects of the professions. Licensing and regulatory oversight and enforcement provide a framework for the protection of the consumer, as well as a foundation for the maintenance of the quality and comprehensiveness of these professions.

The Speech-Language Pathology and Audiology Board serves to protect the public from unskilled, incompetent practitioners by requiring educational and training standards that prepare licensees for independent practice and are consistent with the demands of the current delivery systems. To ensure on-going protection of consumers of speech-language pathology and audiology services, the Board enforces standards of professional conduct by investigating applicant backgrounds, investigating complaints against licensed and unlicensed practitioners, and taking disciplinary action whenever appropriate.

The SLPAB ensures, through its regulatory and disciplinary processes, that professional diagnostic and therapeutic services are provided in a safe and efficacious manner that must be consistent with the current, established standard of care. California consumers in need of Speech-Language Pathology and Audiology services may receive a significantly reduced standard of care without a Board that is able to provide practice standards and guidelines, continuing professional development controls, regulatory oversight, and disciplinary action in conjunction with the state's Attorney General's Office. In addition, the general public is routinely invited to provide opinions to the board.

The dissolution of the SLPAB, and the rationale for the placement of the board's activities under the auspices of the Dept. of Commerce and Consumer Protection is unclear. The practitioners of Speech-Language Pathology and Audiology are bona fide allied health professionals who cannot practice in the State of California without a Master's Degree in these respective fields. The profession of Audiology will be transitioning to a clinical doctoral level profession in the very near future. Thus, the educational and clinical requirements of these professions is certainly on par with those of other allied health professionals whose boards will find themselves, under the direction of the CPR Commission recommendations, maintaining their regulatory board status, and be placed under the auspices of Health and Human Services.

California consumers of speech, language and hearing services deserve no less than the assurance that the practitioners of these professions are educated in highly regarded, state-approved institutions, and meet the most stringent professional and ethical requirements. At the same time, the SLPAB's charges and activities should be practiced in the most equitable, efficient and appropriate environment in order to maintain its effectiveness on behalf of all Californians.